

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.
Jammie Collier

Case: 4:23-mj-30184
Assigned To : Ivy, Curtis, Jr
Assign. Date : 5/5/2023
Description: CMP USA V COLLIER (kcm)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of May 5, 2023, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

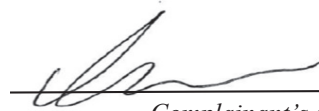
Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:
Please see the attached affidavit.



Continued on the attached sheet.



Complainant's signature

Kenneth Monroe, TFO - ATF&E

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

City and state: Flint, Michigan



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
United States v. Jamie Collier

I, Kenneth Monroe, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am currently employed by the Michigan State Police as a Detective Trooper and have been employed as Trooper since 2010. I have been a law enforcement officer since 2005 including service for Mundy Township Police Department, Swartz Creek Police Department, and City of Burton Police. I am currently assigned to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) as a Task Force Officer. I am currently assigned to the Detroit, Michigan Field Division, Flint Field Office. I am tasked with investigating violations of firearms and narcotics laws. During my employment, I have investigated numerous incidents involving robberies, shootings, and homicides as well as violations of state and federal firearms laws.

2. I make this affidavit based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of

establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the facts below, I have probable cause to believe that on May 5, 2023, Jammie Collier, having been previously convicted of a felony offense, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. §922(g)(1).

BACKGROUND

1. On Friday May 5, 2023, at approximately 4:50 a.m., I was conducting surveillance at 501 W. Tobias St., Flint Michigan in anticipation of the execution of a federal search warrant at the residence. Special Agent (SA) Dan Bowling of the Bureau of Alcohol, Tobacco, and Firearms (ATF) observed a red, Chevrolet Monte Carlo arrive at the residence and pick up an individual. The vehicle then left the location.

2. The federal search warrant was executed at approximately 6:00 a.m. I assisted in searching the residence. While standing in front of the residence I observed the same red, Chevrolet Monte Carlo travelling westbound on Tobias St. with no license plate, passing the residence. I requested Trooper Denis McGuckin, who was in a fully marked Michigan State Police vehicle on scene, conduct a traffic stop of the Monte Carlo.

3. Trooper McGuckin conducted a traffic stop on the vehicle near the intersection of Church St. and Fourth St., Flint, Michigan, for having no license plate attached to the vehicle. I arrived on scene shortly after and observed Trooper McGuckin speaking to the lone occupant and driver, who was later identified as Jammie Collier.

4. I spoke to a second Trooper Aaron Locke, who advised that he saw an item between the seats, but he was unsure what it was. I approached the passenger vehicle and looked inside but was unable to see what Trooper Locke was describing. I then moved back to the driver side of the vehicle and observed a black sweatshirt that appeared to have been intentionally draped over the driver side of the center console area. The sweatshirt appeared out of place as its placement interfered with the operation of the gear shifter, which is essential to the operation of the vehicle.

5. I then moved to the rear of the vehicle and looked between the center console and the driver seat and immediately recognized the textured grip of a pistol. Trooper Locke and I then approached the driver and instructed him to exit the vehicle. I advised Collier that I observed the pistol in the vehicle at which time he stepped out of the vehicle and was placed under arrest. Collier stated he did not have a Michigan concealed pistol license (CPL) and that he has been convicted of a felony.

6. A search of the vehicle was conducted at which time I located a pistol between the driver seat and the center console, directly in front of the seatbelt. The pistol is a CZ brand, 9mm, semi-automatic pistol, model 2075 RAMI, serial number C292208. The pistol was loaded with a magazine that contained 8 rounds of 9mm ammunition. There was no round in the chamber of the weapon, but the safety was found to be in the off position.

7. Inside the center console of the vehicle, I located an “extended” magazine that was loaded with 17 rounds of 9mm ammunition. This magazine was later found to fit the firearm located in the vehicle. In the center console I located an additional two, loose, 9mm rounds of ammunition.

8. Collier was then placed in my vehicle at which time he was read his Miranda Rights. Collier stated he understood his rights and agreed to speak with me about the incident. Collier stated that he met a female on Facebook, who told him to come to 501 W. Tobias to pick her up. He stated he went to the residence, picked her up and then went to his residence at 3312 Timberview Dr.

9. A short time later he drove the female back to 501 W. Tobias to drop her off but saw the police were at the residence. He stated he dropped the female off and then drove by a second time. Collier stated he was nervous

driving by because of “the thing” (firearm) and did not mean to turn down the street.

10. Collier said that before being stopped by the police he placed a sweatshirt over the center console area to conceal the firearm. Collier acknowledged that he has been convicted of several felonies and recently got out of prison on 10/25/2022. He told me that he got the firearm shortly after getting out of prison because he does not feel safe. He traded an individual named “Joseph” crack cocaine for the firearm. Collier said the pistol was loaded with 10 rounds of ammunition and the extended magazine was loaded with 28 rounds of ammunition. Collier shot the firearm shortly after he obtained it to make sure it worked.

11. Collier stated he sells crack cocaine and feels it necessary to carry a firearm because he does not feel safe, partially due to being shot in the past.

12. I reviewed Jammie Collier’s computerized criminal history (CCH) and discovered he had been convicted of the following felonies:

- 5/4/2009, 7th Circuit Court, Flint Mi., Felony breaking and entering and felony assault with a dangerous weapon.
- 7/17/2012, 7th Circuit Court Flint Mi., Felony stolen vehicle and felony fleeing and eluding.
- 3/24/2016, U.S. District Court, Eastern District of Michigan, Felon in possession of a firearm.

13. I have spoken with Special Agent Dustin Hurt who has received specialized training regarding the manufacture and shipping of firearms. S/A Hurt advised that the CZ, model 2075 RAMI, 9mm semi-automatic pistol, bearing serial

number C292208, was manufactured outside the state of Michigan and was therefore possessed in and affecting interstate commerce.

CONCLUSION

14. Based on the above information, there is probable cause to believe that Jamie Collier violated 18 U.S.C. § 922(g)(1) on May 5, 2023.

Respectfully submitted,



Kenneth Monroe, Affiant
Task Force Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means on May 5, 2023.



CURTIS IVY, Jr.
United States Magistrate Judge